

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1

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In Re:

WILLIAM J. FOCAZIO,

Debtor.

Chapter 11

Case No. 19-10880 (VFP)

**JOINDER OF FULTON BANK, N.A. TO UNITED STATES TRUSTEE'S
MOTION FOR AN ORDER CONVERTING CASE TO CHAPTER 7**

Fulton Bank, N.A., successor by merger to Fulton Bank of New Jersey ("Fulton Bank"), by and through its undersigned counsel, submits this joinder to the motion of the United States Trustee (the "UST") to convert the above captioned bankruptcy case to a case under chapter 7 (the "Motion to Convert").

1. Fulton Bank is a creditor with a general unsecured claim in the sum of \$1,293,014.85. Fulton Bank's claim arises from the Debtor's personal guaranty of certain lease financing provided by Fulton Bank to the Debtor's entities, which has been reduced to judgment by the Superior Court of New Jersey (the "State Court"). On February 4, 2019, Fulton Bank filed a Proof of Claim in this matter. *See*, Claim No. 1-1.

2. Fulton Bank joins in the UST's Motion to Convert for the reasons set forth in the Motion to Convert. Fulton Bank believes that conversion to Chapter 7, as opposed to dismissal of the bankruptcy case, is in the best interest of creditors and the estate.

ARCHER & GREINER
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Attorneys for Fulton Bank, N.A.

Dated: March 13, 2020

By: /s/ Jerrold S. Kulback.
Jerrold S. Kulback

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